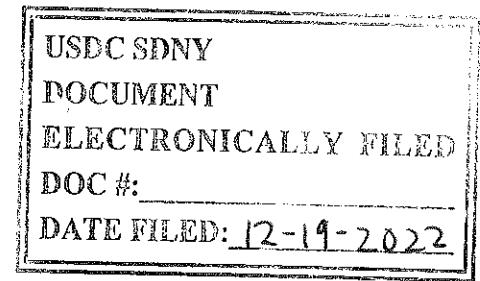


MEMO ENDORSED

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December 16, 2022

VIA ECF & HAND DELIVERY

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Telecom Business Solution, LLC, et al. v. Terra Towers Corp., et al.*,
Case No. 1:22-cv-01761-LAK**

Dear Judge Kaplan:

We represent Respondents/Cross-Petitioners Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc (“Respondents”). Pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, Respondents respectfully seek leave to file under seal their reply papers in support of their petition to vacate the Second Partial Final Award, including Respondents’ reply memorandum of law and the declaration of Juan J. Rodriguez (with exhibits).

The Arbitration out of which this proceeding arises is governed by a procedural order that requires the parties to:

treat the details of the Arbitration as private and confidential, except to the extent necessary to comply with mandatory applicable laws, including regulatory obligations, court orders, or orders of a regulatory or an administrative body, or to comply with obligations to insurers, auditors, accountants, or investors. In such cases, the disclosure shall not extend beyond what is legally required and any non-governmental recipients shall commit to maintain the information in confidence.¹

Respondents’ reply papers contain information that would be covered by the foregoing confidentiality order. Respondents will promptly confer with the Petitioners concerning

¹ Procedural Order No. 2, ¶ 22 (ECF No. 6-1).

Hon. Lewis A. Kaplan
December 16, 2022
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what portions, if any, of the reply papers should remain filed under seal. In the meantime, Respondents respectfully request leave to file their reply papers under seal.

Respectfully submitted,

/s/ Michael B. Smith

Michael B. Smith

/s/ Juan J. Rodriguez

Juan J. Rodriguez

Counsel for Respondents/Cross-Petitioners

cc: all Counsel of Record (via ECF)

Granted
SO ORDERED
lewis Kaplan
LEWIS A. KAPLAN, USDJ

12/19/22